

April 4, 2025

Via ECF

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Courthouse
Federal Square
Newark, New Jersey 07101

Re: *Khalil v. Trump, et al.*, No. 2:25-cv-1963 (MEF) (MAH)

Dear Judge Farbiarz,

In light of the Court's Opinion and Order of April 4, 2025 (ECF 170), certifying its April 1 Opinion and Order (ECF 153) for appeal under 28 U.S.C. 1292(b), and noting that "the Court would not expect to stay the proceedings here," Petitioner's counsel respectfully write to indicate our readiness to present argument at the earliest opportunity on Petitioner's pending motion for release (ECF 93) and/or his motion to compel his return to this District (ECF 11, 73, 96), both fully briefed, should the Court wish to hear argument. Petitioner Mahmoud Khalil now nears a full month in detention and, as the Court is aware, his U.S. citizen spouse expects to give birth to their first child imminently. Undersigned counsel and Petitioner remain grateful for the attention and expedition with which the Court has treated this matter.

Respectfully submitted,

_____/s/_____

DRATEL & LEWIS

Amy E. Greer
29 Broadway, Suite 1412
New York, NY 10006
Tel.: (212)732-8805
agreer@dratellewis.com

CENTER FOR CONSTITUTIONAL RIGHTS

Baher Azmy
Samah Sisay*
Diala Shamas*
666 Broadway, 7th Floor
New York, NY 10012
Tel.: (212) 614-6464
bazmy@ccrjustice.org
ssisay@ccrjustice.org
dshamas@ccrjustice.org

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Ramzi Kassem*
Naz Ahmad
Mudassar Hayat Toppa*
Shezza Abboushi Dallal*
CUNY School of Law
2 Court Square, 5th Floor
Long Island City, NY 11101
Tel.: (718) 340-4558
ramzi.kassem@law.cuny.edu
naz.ahmad@law.cuny.edu
mudassar.toppa@law.cuny.edu
shezza.dallal@law.cuny.edu

**WASHINGTON SQUARE LEGAL SERVICES,
INC.**

Alina Das*
Immigrant Rights Clinic
245 Sullivan Street, 5th Floor
New York, New York 10012
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570 Broad Street, 11th Floor
Newark, NJ 0710
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Amy Belsher*
Robert Hodgson*
Veronica Salama*
Molly Biklen*
125 Broad Street, 19th Floor
New York, NY 10004
Tel.: (212) 607-3300
abelsher@nyclu.org

VAN DER HOUT LLP

Marc Van Der Hout*
Johnny Sinodis*
Oona Cahill*
360 Post Street, Suite 800
San Francisco, CA 94108
Tel.: (415) 981-3000
Fax: (415) 981-3003
ndca@vblaw.com

alina.das@nyu.edu

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

Omar Jadwat*
Noor Zafar*
Sidra Mahfooz*
Brian Hauss*
Esha Bhandari*
Vera Eidelman*
Tyler Takemoto*
125 Broad Street, 18th Floor
New York, NY 10004
Tel.: (212) 549-2500
ojadwat@aclu.org

Counsel for Petitioner

**Admitted pro hac vice*